

Petition of Fitchburg Gas and Electric Light Company for  
Approval of its Annual Electric Reconciliation Mechanism  
and Inflation Adjustment Filing and Accompanying Tariffs

The following are the Attorney General's First Set of Document and Information Requests in the above captioned proceeding.

1. These Document and Information Requests call for all information, including information contained in documents, which relates to the subject matter of the requests and which is known or available to Fitchburg Gas and Electric Light Company or to any individual or entity sponsoring testimony or retained by the Company to provide information, advice, testimony or other services in connection with this proceeding.
2. Where a Request has a number of separate subdivisions or related parts or portions, a complete response is required to each such subdivision, part, or portion. Any objection to a Request should clearly indicate the subdivision, part, or portion of the Request to which it is directed.
3. If information requested is not available in the exact form requested, provide such information or documents as are available that best respond to the Request.
4. These requests are continuing in nature and require supplemental responses when further or different information with respect to the same is obtained.
5. Each response should be furnished on a separate page headed by the individual Request being answered. Individual responses of more than one page should be stapled or bound and each page consecutively numbered.

6. Each Document and Information Request to "Please provide all documents..." or similar phrases includes a request to "identify" all such documents. "Identify" means to state the nature of the document, the date on which it was prepared, the subject matter and the titles and the names and positions of each person who participated in the preparation of the document, the addressee and the custodian of the documents. To the extent that a document is self-identifying, it need not be separately identified.
7. For each document produced or identified in a response which is computer generated, state separately (a) what types of data, files, or tapes are included in the input and the source thereof, (b) the form of the data which constitutes machine input (e.g., punch cards, tapes), (c) a description of the recording system employed (including descriptions, flow charts, etc.), and (d) the identity of the person who was in charge of the collection of input materials, the processing of input materials, the data bases utilized, and the programming to obtain the output.
8. If a Document and Information Request can be answered in whole or part by reference to the response to another Request served in this proceeding, it is sufficient to so indicate by specifying the other Request by participant and number, by specifying the parts of the other response which are responsive, and by specifying whether the response to the other Request is a full or partial response to the instant Request. If it constitutes a partial response, the balance of the instant Request must be answered.
9. If the Company cannot answer a Request in full, after exercising due diligence to secure the information necessary to do so, state the answer to the extent possible, state why the Company cannot answer the Request in full, and state what information or knowledge is in the Company's possession concerning the unanswered portions.
10. If, in answering any of these Document and Information requests, you feel that any Request or definition or instruction applicable thereto is ambiguous, set forth the language you feel is ambiguous and the interpretation you are using responding to the Request.
11. If a document requested is no longer in existence, identify the document, and describe in detail the reasons the document is unavailable.
12. Provide copies of all requested documents. A response which does not provide the Attorney General with the responsive documents, and requests the Attorney General to inspect documents at any location is not responsive.

13. If you refuse to respond to any Document and Information Request by reason of a claim or privilege, or for any other reason, state in writing the type of privilege claimed and the facts and circumstances you rely upon to support the claim of privilege or the reason for refusing to respond. With respect to requests for documents to which you refuse to respond, identify each such document.
14. Each request for information includes a request for all documentation which supports the response provided.
15. Provide four copies of each response.
16. The term "Company" refers to Fitchburg Gas and Electric Light Company. Unless the request specifically provides otherwise, the term Company includes all witnesses, representatives, employees, and legal counsel.
17. Please furnish each response on a separate sheet of paper, beginning with a restatement of the question.

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| AG-1-1 | Referring to Schedule MHC-2, Page 4, please provide documentation supporting the adjustments in Columns (1) – (4) for the years 1998 – 2002.                                  |
| AG-1-2 | Referring to Schedule MHC-2, Page 8, please provide supporting documentation for the tax basis of \$2,172,000.  |
| AG-1-3 | Referring to Schedule MHC-2, Page 9, please provide supporting documentation for the proceeds of \$328,000 and transaction costs of \$47,000.                                 |
| AG-1-4 | Referring to Schedule MHC-2, Page 10, please provide supporting documentation for the tax basis of \$997,000.   |
| AG-1-5 | Referring to Schedule MHC-2, Page 15, please provide supporting documentation for the variable and fixed costs for each purchased power contract for the years 1998-2002.     |
| AG-1-6 | Referring to Schedule MHC-2, Page 16, please provide supporting documentation for the annual obligations in MWH for each purchased power contract for the years 1998-2000.    |
| AG-1-7 | Referring to Schedule MHC-2, Page 16, please provide supporting documentation for the transmission in support of remote generation.   |
| AG-1-8 | Referring to Schedule MHC-3, Page 1, please explain how the Company decided which line items in the Electric Division column were allocable to generation and which were not. |

- AG-1-9 Referring to Schedule MHC-4, Pages 1-3, please provide supporting documentation for the generation fuel costs.
- AG-1-10 Referring to Schedule MHC-4, Pages 1-3, please explain why the Company includes fixed generation costs in the lost revenue calculation.
- AG-1-11 Referring to Schedule MHC-4, Page 1, why are there fuel costs for Turbine #7 in 1998, although there is no generation for Turbine #7 in 1998 on Schedule MHC-7?
- AG-1-12 Referring to Schedule MHC-4, Pages 1-3, please cite the authorization to accrue interest on the cumulative balance of lost revenue.
- AG-1-13 Referring to Schedule MHC-4, Pages 1-3, please explain why the Company calculates the interest on the gross balance rather than on the net of tax balance.
- AG-1-14 Referring to Schedule MHC-4, Page 2, why did the Company not adjust the generation cost per kWh in May 1999 to reflect the divestiture of New Haven Harbor?
- AG-1-15 Referring to Schedule MHC-5, please provide the 1983 FERC Form 1 from which the generation expenses are derived.
- AG-1-16 Referring to Schedule MHC-5, Page 4, why was plant used as the basis for allocating administrative and general expenses?
- AG-1-17 Please provide a copy of Schedule MHC-6, Page 1, which is missing from the volume.
- AG-1-18 Referring to Schedule MHC-6, Page 4, please explain why the Hydro Quebec purchases commence again in September 2001.
- AG-1-19 Referring to Schedule MHC-7, Page 1, why is the Pinetree output zero for September 1998?
- AG-1-20 Referring to Schedule MHC-7, Page 2, why is the transfer price \$0.032, rather than \$0.035 in January?
- AG-1-21 Referring to Schedule MHC-7, Page 2, why is the PSNH output zero for November and December 1998?

- AG-1-22 Referring to Schedule MHC-8, please provide supporting calculations for the transition charge revenues on Line 21.
- AG-1-23 Referring to Schedule MHC-9, please explain why the Company calculates the return on the gross balance rather than on the net of tax balance, given that the costs are deductible for income taxes as incurred.
- AG-1-24 Referring to Schedule MHC-10, please provide supporting calculations for the Total Revenues on Line 17.
- AG-1-25 Referring to Schedule MHC-10, Page 4, why is the revenue different from the cost of the power contract?
- AG-1-26 Referring to Schedule MHC-10, please explain why the Company calculates the return on the gross balance rather than on the net of tax balance, given that the costs are deductible for income taxes as incurred.
- AG-1-27 Referring to Schedule MHC-11, Page 2, please provide supporting documentation and calculations for the SOSFA balance of \$2,622,479. The response should show the complete derivation of this balance and document the actual payment of costs that result in this balance as of January 1, 2001 and should show the source from which this balance was transferred.
- AG-1-28 Referring to Schedule MHC-11, Page 7, why is the purchased power cost in January 2001 so much higher than the costs for the other months in 2001?
- AG-1-29 Referring to Schedule MHC-12, please provide supporting calculations for the Total Revenues on Line 10.

Dated: May 24, 2002